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10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

CASE NO. 3:17-cv-00939-WHA

13 Plaintiff,

**DECLARATION OF LINDSAY COOPER
IN SUPPORT OF PLAINTIFF WAYMO
LLC'S REVISED ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
PORTIONS OF ITS SUPPLEMENTAL
BRIEF IN SUPPORT OF MOTION FOR
PRELIMINARY INJUNCTION AND
SUPPORTING EXHIBITS THERETO**

14 vs.

15 UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
16 LLC,

17 Defendants.

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1 I, Lindsay Cooper, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
 3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
 4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
 5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo’s Administrative Motion to File Under
 7 Seal Portions of Its Supplemental Brief In Support of Motion for Preliminary Injunction and
 8 Supporting Exhibits Thereto, filed concurrently herewith (the “Administrative Motion”). The
 9 Administrative Motion seeks an order sealing the following materials filed concurrently herewith:

Document	Portions to Be Filed Under Seal	Designating Party
Waymo’s Supplemental Brief in Support of Motion for Preliminary Injunction	Highlighted Portions	Waymo (green highlighting); Defendants (blue highlighting)
Exhibit 132 to the Declaration of Jordan Jaffe (“Jaffe Decl.”), filed concurrently herewith.	Highlighted Portions	Waymo (green highlighting); Defendants (blue highlighting)
Exhibit 133 to the Jaffe Decl.	Entire Document	Waymo
Exhibit 134 to the Jaffe Decl.	Entire Document	Defendants

18 3. Specifically, Waymo’s Supplemental Brief in Support of Motion for Preliminary
 19 Injunction, and supporting exhibits thereto (collectively “Supplemental Brief”) contain or refer to
 20 trade secret and confidential business information, which Waymo seeks to seal.

21 4. Waymo’s Supplemental Brief (portions highlighted in green), and Jaffe Decl. Exhibits
 22 132-133 each contain, reference, and/or describe Waymo’s asserted trade secrets. The information
 23 Waymo seeks to seal includes the confidential design and functionality of Waymo’s proprietary
 24 autonomous vehicle system, which Waymo maintains as secret. This information also contains Uber
 25 documents that reflect Waymo’s misappropriated trade secrets. I understand that these trade secrets
 26 are maintained as secret by Waymo (Dkt. 25-47) and are valuable as trade secrets to Waymo’s
 27 business (Dkt. 25-31). The public disclosure of this information would give Waymo’s competitors
 28 access to in-depth descriptions—and analysis—of the functionality of Waymo’s autonomous vehicle

1 system. If such information were made public, I understand that Waymo's competitive standing
2 would be significantly harmed.

3 5. Waymo's request to seal is narrowly tailored to those portions of the Supplemental
4 Brief and supporting exhibits that merit sealing.

5

6 I declare under penalty of perjury under the laws of the State of California and the United
7 States of America that the foregoing is true and correct, and that this declaration was executed in San
8 Francisco, California, on May 8, 2017.

9 By /s/ Lindsay Cooper
10 Lindsay Cooper
11 Attorneys for WAYMO LLC

12
13 **SIGNATURE ATTESTATION**

14 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the
15 filing of this document has been obtained from Lindsay Cooper.

16 /s/ David Perlson
17 David Perlson
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